

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
v. :
: :
: :
: 13-CR-179

ROBERT MANSFIELD

MOTION FOR CONTINUANCE

Defendant, Robert Mansfield by through his attorney Sharif N. Abaza Esquire respectfully moves this Honorable Court for a continuance of the trial date currently set for August 7, 2013 at 11:00am, and avers the following in support thereof:

1. The defendant Robert Mansfield is represented by Sharif N. Abaza Esquire, who entered his appearance at the time of arraignment.
2. The Assistant United States Attorney on this case is Robert Livermore, Esquire. Mr. Livermore has authorized defense counsel to state that he has no objection to extending the trial date.
3. Defendant has not reviewed all discovery at this juncture and will need to review same in order to properly prepare for trial. Moreover, defense counsel and United States Attorney are interested in engaging in negotiations toward a non-trial disposition of this matter.
4. Failure to provide the Defendants and defense counsel with additional time to engage in further negotiations with the Government would not serve the ends of justice. See 18 U.S.C. 3161(h)(8)(B)(i) and 18 U.S.C. 3161(h)(8)(B)(iv).
5. Granting this request would serve the best interest of the public and the Defendants in regard to speedy trial rights. See U.S.C. 3161(h)(8)(A).
6. Although this matter is not complex, there are significant pre-trial motions in the Omnibus Motion including suppression issues and identification issues. It may save this Court time and effort by not having to litigate these outstanding motions at this juncture. This is just one more reason stated herein by counsel that a continuance may be warranted. However, all counsel and defendants understand that it is at the Court's discretion whether to grant this continuance.

7. The Defendant Robert Mansfield is aware of this request for a continuance and has voluntarily and knowingly agreed to a postponement of the August 7, 2013 Trial date and hereby waives any rights pursuant to Federal Speedy Trial Act.
8. WHEREFORE, defendant, Robert Mansfield, respectfully request that the within relief be granted.

Respectfully Submitted,
By:

Sharif N. Abaza, Esquire
I.D. No. 74346
The Law office of Sharif N. Abaza 44 East Court Street
Doylestown, PA 18914 (o)215-525-4287
(f)215-525-4299 Snabaza@abazalaw.com

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CERTIFICATE OF SERVICE

I, Sharif N. Abaza, Esquire, hereby certify that on July 19, 2013, a true and correct copy of Defendant, Robert Mansfield's Motion for a continuance was filed electronically with the Court.

The Honorable Petrese B. Tucker.
United States District Court for the Eastern District of
and
Robert Livermore
United States Attorney's Office
615 Chestnut Street
Suite 1250
Philadelphia, PA 19106-4476
215-861-8516

Sharif N. Abaza, Esquire
I.D. No. 74346
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Doylestown, PA 18914
(o)215-525-4287
(f)215-525-4299